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March 19, 2018

**BY HAND AND ECF**

Honorable Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007

Cessna Finance Corporation v. Al Ghaith Holding Company PJSC,  
15 Civ. 9857 (PGG)

Dear Judge Gardephe:

This firm represents Petitioner Cessna Finance Corporation (“Cessna”) in the above referenced matter.

Cessna initiated this action on December 17, 2015, with the filing of a Petition seeking an order confirming, under the Federal Arbitration Act, 9 U.S.C. §§ 1 et seq. (the “FAA”), and the Convention on the Recognition and Enforcement of Foreign Arbitral Awards, 9 U.S.C. §§ 201-208 (the “Convention”), a \$51,747,681.96<sup>1</sup> arbitration award rendered by an ICC International Court of Arbitration tribunal seated in New York City on October 26, 2015 (the “Award”) against Al Ghaith Holding Company PJSC (“Al Ghaith”).

On February 26, 2016, Al Ghaith filed a Notice of Cross-Petition (ECF Dkt. No. 16) seeking an order, pursuant to the FAA and the Convention, vacating the Award on the grounds that in rendering it the arbitrators acted in “manifest disregard” of applicable law. As of April 20, 2016, briefing on the Cross-Petition was complete. At the time of filing neither party sought oral argument pursuant to Rule IV(D) of Your Honor’s Individual Rules of Practice in Civil Cases. The last communication with the Court by either party was my letter to Your Honor of April 25, 2017, inquiring whether the Court might find it useful to schedule argument or a preliminary conference.

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<sup>1</sup> Plus post-Award interest.



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Given the lapse of time, and our client's concern with attempting to enforce the Award if it is confirmed, we respectfully ask if there is anything further the parties might do, such as additional briefing or argument, that might facilitate the disposition of the Cross-Petition.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in blue ink, reading 'Christopher Allegaert', with a stylized flourish at the end.

Christopher Allegaert

cc: Allan M. Bahn, Esq. (Counsel for Cross-Petitioner  
Al Ghaith Holding Company PJSC) (by ECF)